

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LATOYA T. FERGUSON, on behalf of herself
And all others similarly situated,

Plaintiff,

-against-

TODD, BREMER & LAWSON, INC.,

Defendant(s).

ANSWER

08 CV 2508
(Cedarbaum, J.)

-----x

Defendant, TODD, BREMER & LAWSON, INC., by its attorney
MEL S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as
follows:

1. The defendant denies knowledge or information
sufficient to form a belief as to each and every allegation
contained in paragraph "1" of the complaint.

2. Defendant denies knowledge or information sufficient to
form a belief as to each and every allegation contained in paragraph
"2" of the complaint.

3. Defendant admits the allegations contained in paragraph
"3" of the complaint.

4. Defendant denies each and every allegation contained in
paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits that it is a collection agency involved in the collection of consumer debt.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant admits the allegations contained in paragraph "9" of the complaint.

10. Defendant admits the allegations contained in paragraph "10" of the complaint.

11. Defendant admits the allegations contained in paragraph "11" of the complaint.

12. Defendant admits the allegations contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant admits the allegations contained in paragraph "14" of the complaint.

15. Defendant admits the allegations contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant admits the allegations contained in paragraph "17" of the complaint.

18. Defendant admits the allegations contained in paragraph "18" of the complaint.

19. Defendant admits the allegations contained in paragraph "19" of the complaint.

20. Defendant admits the allegations contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies each and every allegation contained in paragraph "26" of the complaint.

27. Defendant denies each and every allegation contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. Defendant denies each and every allegation contained in paragraph "31" of the complaint.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
May 22, 2008



Arthur Sanders (AS-1210)
MEL S. HARRIS AND ASSOCIATES, LLC
Attorneys for defendant
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New York, NY 10004
212-660-1050

TO:

ADAM J. FISHBEIN, ESQ.
Attorney for plaintiff
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